

(Please type or print)

Submitted by: Claudia McCoy

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DOCKETING INFORMATION (Check all that apply)

☐ Emergency Relief demanded in petition

☐ Request for item to be placed on Commission's Agenda expeditiously

☐ Other:

INDUSTRY (Check one)	NATURE OF ACTION (Check all that apply)			
<input type="checkbox"/> Electric	<input type="checkbox"/> Affidavits	<input type="checkbox"/> Letter	<input type="checkbox"/> Request	
<input type="checkbox"/> Electric/Gas	<input type="checkbox"/> Agreement	<input type="checkbox"/> Memorandum	<input type="checkbox"/> Request for Certification	
<input type="checkbox"/> Electric/Telecommunications	<input type="checkbox"/> Answer	<input type="checkbox"/> Motion	<input type="checkbox"/> Request for Investigation	
<input type="checkbox"/> Electric/Water	<input type="checkbox"/> Appellate Review	<input type="checkbox"/> Objection	<input type="checkbox"/> Resale Agreement	
<input type="checkbox"/> Electric/Water/Telecom.	<input type="checkbox"/> Application	<input type="checkbox"/> Petition	<input type="checkbox"/> Resale Amendment	
<input type="checkbox"/> Electric/Water/Sewer	<input type="checkbox"/> Brief	<input type="checkbox"/> Petition for Reconsideration	<input type="checkbox"/> Reservation Letter	
<input type="checkbox"/> Gas	<input type="checkbox"/> Certificate	<input type="checkbox"/> Petition for Rulemaking	<input type="checkbox"/> Response	
<input type="checkbox"/> Railroad	<input type="checkbox"/> Comments	<input type="checkbox"/> Petition for Rule to Show Cause	<input type="checkbox"/> Response to Discovery	
<input type="checkbox"/> Sewer	<input type="checkbox"/> Complaint	<input type="checkbox"/> Petition to Intervene	<input type="checkbox"/> Return to Petition	
<input type="checkbox"/> Telecommunications	<input type="checkbox"/> Consent Order	<input type="checkbox"/> Petition to Intervene Out of Time	<input type="checkbox"/> Stipulation	
<input type="checkbox"/> Transportation	<input type="checkbox"/> Discovery	<input checked="" type="checkbox"/> Prefiled Testimony	<input type="checkbox"/> Subpoena	
<input type="checkbox"/> Water	<input type="checkbox"/> Exhibit	<input type="checkbox"/> Promotion	<input type="checkbox"/> Tariff	
<input type="checkbox"/> Water/Sewer	<input type="checkbox"/> Expedited Consideration	<input type="checkbox"/> Proposed Order	<input type="checkbox"/> Other:	
<input type="checkbox"/> Administrative Matter	<input type="checkbox"/> Interconnection Agreement	<input type="checkbox"/> Protest		
<input type="checkbox"/> Other:	<input type="checkbox"/> Interconnection Amendment	<input type="checkbox"/> Publisher's Affidavit		
	<input type="checkbox"/> Late-Filed Exhibit	<input type="checkbox"/> Report		

RETURN DATE: 1/18/12

SERVICE: OK

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January 17, 2012

VIA OVERNIGHT DELIVERY

Ms. Jocelyn G. Boyd
Chief Clerk of the Commission
South Carolina Public Service Commission
101 Executive Center Drive, Suite 100
Columbia, South Carolina 29210
(803) 896-5100

RECEIVED
2012 JAN 18 17:10:15
SC PUBLIC SERVICE
COMMISSION
✓

Re: 1 800 Collect, Inc.
Docket No. 2012-16-C

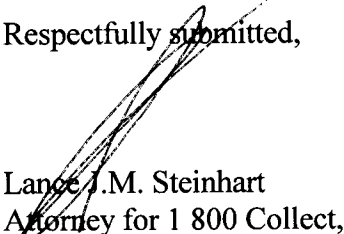
Dear Ms. Boyd:

Pursuant to letter dated January 11, 2012 in the above-referenced docket, enclosed please find for filing an original and twenty-five (25) copies of the company's pre-filed testimony.

I have enclosed an extra copy of this letter to be date-stamped and returned to me in the self-addressed, postage prepaid envelope I have provided.

If you have any questions or if I may provide you with any additional information, please do not hesitate to contact me.

Respectfully submitted,


Lance J.M. Steinhart
Attorney for 1 800 Collect, Inc.

Enclosures

cc: Lessie Hammonds – ORS via e-mail: lhammon@regstaff.sc.gov
Scott Elliott via e-mail: selliott@elliottlaw.us
Jackie Livingston via e-mail: jlivingston@elliottlaw.us

**BEFORE THE
PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2012-16-C**

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2012 JAN 18 4:10:15
PUBLIC SERVICE
COMMISSION

**IN RE: Application of 1 800 Collect, Inc.)
Authority to Operate as a Reseller of)
Interexchange Telecommunication Services)
Within The State of South Carolina and to)
be Regulated in Accordance with Procedures)
Established for Alternative Regulation)
In Order Nos. 95-1 734 and 96-55 In)
Docket No. 95-661 -C.)**

**DOCKET 2012-16-C
DATE JANUARY 17, 2012**

I. Introduction

- 1 1. **Q. Please state your name and business address.**
- 2 A. My name is Brian Rhys. My business address is 1658 Gailes Boulevard, Suite B.,
- 3 San Diego, California 92154.
- 4 2. **Q. By whom are you employed and in what capacity?**
- 5 A. I am Treasurer of 1 800 Collect, Inc. ("1 800 Collect").
- 6 3. **Q. Please give a brief description of your background and experience in business**
- 7 **and telecommunications.**
- 8 A. My background and experience, as well as other members of the management team
- 9 of 1 800 Collect, is set forth in Attachment 4 to our application.
- 10

1 4. **Q. What is the purpose of your testimony?**

2 A. The purpose of my testimony is to describe the nature of 1 800 Collect's proposed
3 service offering within the State of South Carolina, and to demonstrate its financial,
4 managerial, and technical ability to provide the telecommunications services for
5 which authority is sought herein.

6 5. **Q. Do you wish to incorporate by reference any documents into your testimony?**

7 A. Yes. I wish to incorporate by reference the underlying Application filed in this
8 proceeding and its associated attachments.

9 **II. The Business of 1 800 Collect**

10 6. **Q. Has 1 800 Collect registered to do business in South Carolina?**

11 A. Yes. 1 800 Collect is a Florida Corporation that has received authorization to
12 transact business within the State of South Carolina. A copy of 1 800 Collect's
13 Articles of Incorporation is attached to the Application as Attachment "1" and a copy
14 of the document of authorization from the State of South Carolina is attached to that
15 Application as Attachment "2".
16

1 7. **Q. Please describe the services 1 800 Collect intends to provide within the State of**
2 **South Carolina.**

3 A. 1 800 Collect seeks authority to operate as a reseller of intraLATA and interLATA
4 intrastate telecommunications services to the public on a statewide basis. 1 800
5 Collect seeks authority to offer on a resale basis within South Carolina intrastate,
6 interLATA and, to the extent authorized by the Commission, intraLATA direct-
7 dialed services including alternate operator telecommunications services. 1 800
8 Collect will handle operator-assisted calls, such as collect, third party billed, person-
9 to-person and credit card calls from payphone locations and other traffic aggregator
10 locations, such as hotels and hospitals. 1 800 Collect will not provide service to
11 correctional/confinement facilities. Calls will be completed by either a live operator
12 or an automated service, and services will be available 24 hours per day, & days per
13 week. 1 800 Collect seeks statewide authority to provide intraLATA services
14 authorized by the Commission in Docket Nos. 92-182-C, 92-183-C, and 92-200-C
15 and to be regulated in accordance with procedures established for alternative
16 regulation in Order Nos. 95-1734 and 96-55 in Docket No. 95-661-C. 1 800
17 Collect has no plans at this time to construct any telecommunications transmission
18 facilities of its own and seeks no construction authority. 1 800 Collect will operate
19 exclusively as a reseller. 1 800 Collect intends to engage in "switchless" resale. 1
20 800 Collect will arrange for the traffic of underlying subscribers to be routed directly
21 over the networks of Applicant's network providers.

22 8. **Q. What carrier will 1 800 Collect utilize as its underlying carriers for services in**
23 **South Carolina?**

24 A. 1 800 Collect intends to utilize AT&T nad Qwest and similar companies as its
25 underlying carriers. 1 800 Collect will choose its underlying carriers based upon the

1 quality of service of the carrier properly certified by the Commission to provide such
2 service.

3 9. Q. Does 1 800 Collect currently provide intrastate telecommunications services in
4 any other state?

5 A. No. 1 800 Collect does not currently provide service in any state .

6 10. Q. Has 1 800 Collect ever had an application for a certificate of public convenience
7 and necessity denied?

8 A. No.

9 11. Q. Does 1 800 Collect intend to file a tariff with the Commission?

10 A. Yes. 1 800 Collect filed a tariff along with its Application in this proceeding which
11 it will modify as necessary in order to meet the Commission's requirements. We
12 believe 1 800 Collect's Tariff will comport with all Orders, Rules, and Regulations
13 of the Commission.

14 12. Q. Will 1 800 Collect comply with the Commission's orders regarding the resale of
15 interexchange carrier services?

16 A. Yes. 1 800 Collect will at all times provide and market interexchange carrier
17 services in accordance with current Commission policies. In addition, 1 800 Collect
18 at all times will provide interstate services in compliance with all FCC rules and
19 regulations.
20

1 13. Q. Has 1 800 Collect provided any intrastate telecommunications services within
2 the State of South Carolina?

3 A. No it has not.

4 14. Q. What rates will 1 800 Collect charge upon receipt of certification?

5 A. 1 800 Collect will charge the tariffed rates approved by the Commission.

6 15. Q. How will 1 800 Collect market services in South Carolina?

7 A. 1 800 Collect intends to market its services via direct sales by 1 800 Collect's
8 employees and independent sales agents. 1 800 Collect, Inc. intends to market via
9 direct sales with traffic aggregators such as hospitals and hotels and Mobile Phone
10 Operators.

11 III. Managerial, Technical and Financial Qualifications

12 16. Q. Does 1 800 Collect have sufficient managerial, technical, and financial
13 resources and ability to provide the telecommunications services proposed in its
14 Application?

15 A. Yes. 1 800 Collect has sufficient technical, financial, and managerial resources and
16 ability to provide the telecommunications services for which authority is sought
17 herein. 1 800 Collect's personnel represent a broad spectrum of business and
18 technical disciplines, possessing many years of individual and aggregate
19 telecommunications experience.

20 My qualifications and experience are discussed on Attachment 4 to our
21 application, which attachment also supports Applicant's managerial and technical
22 ability to provide the services for which authority is sought herein.

23

1 17. Q. How does 1 800 Collect handle customer service requests?
2 A. 1 800 Collect's customer service department handles all such requests. 1 800 Collect
3 can be reached by toll free number.

4 18. Q. Please describe the financial condition of 1 800 Collect.
5 A. In support of 1 800 Collect's financial ability to provide the services sought herein, 1
6 800 Collect's Balance Sheet Summaries as of January 31, 2010 and January 31, 2011
7 and Income Statement summaries for the periods ended February 1, 2009 to January
8 31, 2010 and February 1, 2010 to January 31, 2011 was submitted as Attachment 5
9 to the Application.

10 IV. Public Interest

11 19. Q. How will residents of South Carolina benefit from 1 800 Collect's services and
12 presence in South Carolina?

13 A. Commission approval should bring the following long-term benefits to telephone
14 users:
15 (1) More competition, additional services and a better product at industry
16 competitive prices;
17 (2) Increased consumer choice as well as innovative telecommunications
18 services;
19 (3) Efficient use of existing communications resources as well as increased
20 diversification and reliability of supply of communications services;
21 (4) Development of an expanded telecommunications supply industry in South
22 Carolina;

1 (5) An expanded tax base and revenue source for the State of South Carolina;
2 and,

3 (6) Additional sources of revenues for Local Exchange Companies through
4 access charges and billing and collection fees.

5 20. Q. **Has the Company ever been the subject of an investigation by any state**
6 **Regulatory body or by the FCC?**

7 A. No.

8 21. Q. **Will the Company agree to abide by and comply with the Commission's**
9 **Rules and Regulations and Commission Orders in its operations in South**
10 **Carolina?**

11 A. Yes.

12 22. Q. **Does this conclude your testimony?**

13 A. Yes. I would like to thank the Commission for this opportunity to provide
14 information relevant to 1 800 Collect's Application and am ready to provide any
15 additional information that the Commission may need in making its decision.
16